

RABINOWITZ, LUBETKIN & TULLY, LLC

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Barry J. Roy

Counsel to Jay L. Lubetkin,

Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

In re:

WLC GENERAL CONSTRUCTION, LLC,

Debtor.

Case No. 17-21851 (JKS)

Honorable John K. Sherwood

Chapter 7

**NOTICE OF MOTION FOR ENTRY OF ORDER
AUTHORIZING PUBLIC SALE OF PROPERTY OF THE ESTATE**

PLEASE TAKE NOTICE that on **August 22, 2017 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, Jay L. Lubetkin, Chapter 7 Trustee (the "Trustee") for the bankruptcy estate of WLC General Construction, LLC (the "Debtor"), by and through his counsel, Rabinowitz, Lubetkin & Tully, LLC, shall move before the Honorable John K. Sherwood, United States Bankruptcy Judge, at the United States Bankruptcy Court, Martin Luther King, Jr. Federal Building, 50 Walnut Street, Newark, New Jersey, for entry of an Order authorizing the public sale of property of the estate (the "Motion").

PLEASE TAKE FURTHER NOTICE that in support of the Motion, the undersigned shall rely on the accompanying application of counsel, Certification of Jay L. Lubetkin and proposed form of order submitted simultaneously herewith.

PLEASE TAKE FURTHER NOTICE that pursuant to D.N.J. LBR 9013-2, no brief is being submitted as the relief requested by the Trustee is fully set forth in the accompanying application of counsel and the Trustee's supporting Certification.

PLEASE TAKE FURTHER NOTICE that oral argument is requested if an objection is made to the Motion.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested by the Trustee shall: (i) be in writing; (ii) specify with particularity the basis of such objection; and (iii) be filed with the Clerk of the Bankruptcy Court, and simultaneously served on counsel for the Debtor, Rabinowitz, Lubetkin & Tully, L.L.C., 293 Eisenhower Parkway, Suite 100, Livingston, New Jersey 07039 (Attention: Barry J. Roy, Esq.), so as to be received by no later than seven days prior to the return date hereof.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief may be granted without a hearing.

RABINOWITZ, LUBETKIN & TULLY, LLC
Counsel to Jay L. Lubetkin, Chapter 7 Trustee

By: /s/ Barry J. Roy
BARRY J. ROY

DATED: July 19, 2017